

**United States District Court
Northern District of Texas
Dallas Division**

**Bertrum Jean et al.,
Plaintiffs,**

v.

**The City of Dallas and
Amber Guyger,
Defendants.**

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Civil Action No. 3:18-cv-02862-M

**Defendant Amber Guyger's Motion to Extend
Time to File Answer or Rule 12 Motion**

Defendant Amber Guyger ("Guyger") files this motion to extend the time, under Rule 6(b) of the Federal Rules of Civil Procedure, for filing her answer or Rule 12 motion to Plaintiffs' Original Complaint ("Complaint") and shows the following:

1. Plaintiffs filed the Complaint on October 27, 2018, alleging that Defendants violated Plaintiffs' federal constitutional rights.

2. On January 7, 2019, Plaintiffs sent Guyger, through her criminal-defense attorney, Robert L. Rogers, a request for waiver of service. On January 8, 2019, Mr. Rogers signed the waiver of service on behalf of Guyger; accordingly, the deadline for Guyger to file an answer or Rule 12 motion is March 8, 2019.

3. Guyger requests that the time for filing her answer or Rule 12 motion be extended to March 22, 2019. Guyger requests the additional time because her attorney for this case has not completed his review of the case information and materials necessary for filing an answer or Rule 12 motion.

4. On March 6, 2019, the undersigned attorney for Guyger called Plaintiffs'

attorney, Daryl K. Washington, regarding the requested extension of time. Mr. Washington was unavailable, so the undersigned left a detailed message with Mr. Washington's assistant regarding the requested extension. In the message for Mr. Washington, the undersigned requested a 21-day extension of time. In this motion, the requested extension has been shortened to 14 days. As of the time of filing this motion, the undersigned has not heard back from Mr. Washington.

5. This request is made in good faith and not for delay.

Wherefore, Defendant Amber Guyger requests that this motion be granted, that the time for Guyger to file her answer or Rule 12 motion to Plaintiffs' Original Complaint be extended to March 22, 2019, and that Guyger be granted all other relief to which she is entitled.

Respectfully submitted,

s/ Mark E. Goldstucker

Mark E. Goldstucker

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Attorney for Defendant Amber Guyger

Certificate of Conference

On March 6, 2019, the undersigned attorney for Guyger called Plaintiffs' attorney, Daryl K. Washington, regarding the requested extension of time. Mr. Washington was unavailable, so the undersigned left a detailed message with Mr. Washington's assistant regarding the requested extension. As of the time of filing this motion, the undersigned has not heard back from Mr. Washington.

s/ Mark E. Goldstucker

Mark E. Goldstucker

Certificate of Service

On March 8, 2019, a copy of the foregoing document was served electronically through the Court's ECF system on all counsel of record.

s/ Mark E. Goldstucker

Mark E. Goldstucker